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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ERIC TAYLOR, individually

Plaintiff,

vs.

LOYD GRANDT, an individual; KEOLIS TRANSIT SERVICES, LLC., a foreign corporation; DOES 1 through 20; ROE CORPORATIONS 1 through 10 AND ROE LIMITED LIABILITY COMPANIES 1 through 10, inclusive.

Defendant.

Case No.: 2:20-cv-778

**Keolis Transit Services, LLC's Petition  
for Removal**

Keolis Transit Services, LLC petitions to remove this case to the United States District Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28 U.S.C. 1332. “[T]he core principle of federal removal jurisdiction on the basis of diversity -- namely, that it is determined (and must exist) as of the time the complaint is filed and removal is effected.”<sup>1</sup> There are three named parties. Plaintiff alleges he is a resident of Nevada.<sup>2</sup> When the complaint was filed defendant Loyd Grandt had become a resident of California. Keolis Transit Services, LLC is a wholly owned subsidiary of Keolis Transit America, Inc., a Delaware corporation with its principal place of business in Massachusetts.

<sup>1</sup> *Strotek Corp. v. Air Transp. Ass'n of Am.*, 300 F.3d 1129, 1131 (9th Cir. 2002).

<sup>2</sup> ECF No. 1-2 at ¶ 1.

1 The amount in controversy is also satisfied. Before filing his lawsuit, Plaintiff indicated he  
2 has sustained damages of at least \$84,765.80.<sup>3</sup> This amount alone exceeds the \$75,000 diversity  
3 jurisdiction threshold.

4 The complaint was filed on April 1, 2020 and Keolis was served on April 10, 2020.  
5 Removal is timely and has occurred within one year.

6 DATED this 30<sup>th</sup> day of April, 2020.



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9 BY: /s/ Michael P. Lowry

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28 <sup>3</sup> ECF No. 1-3.

**Certificate of Service**

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on April 30, 2020, I served **Keolis Transit Services, LLC's Petition for Removal** as follows:

- ☒ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☐ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

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| Pacific West Injury Law<br>Kristopher Helmick, Esq.<br>6141 S. Rainbow Blvd. Suite 110<br>Las Vegas, NV 89118<br>P: 702-602.4878 |  |
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BY: /s/ Amanda Hill  
 An Employee of

